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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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**NST GLOBAL, LLC, d/b/a SB  
TACTICAL,**

**Plaintiff,**

**v.**

**SIG SAUER INC.,**

**Defendant.**

**Case No. 1:19-cv-00121-CFC**

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**DECLARATION OF WILLIAM BRES IN SUPPORT OF  
PLAINTIFF NST GLOBAL, LLC'S RESPONSE IN OPPOSITION  
TO DEFENDANT'S MOTION FOR TRANSFER**

Pursuant to 28 U.S.C. § 1746, I, William Brees, hereby declare:

1. My name is William Brees. I am a lawyer at the law firm of Maxey-Fisher, PLLC, 100 Second Avenue South, Suite 401N, St. Petersburg, Florida 33701.
2. I am one of the attorneys representing the Plaintiff NST Global, LLC dba SB Tactical in this lawsuit.
3. I am admitted to practice in the state and federal courts in Florida.
4. I am over the age of majority, have personal knowledge of the matters contained herein, and am of sound mind and body to make this Declaration under penalty of perjury.
5. The Declaration of John Brasseur in Support of Defendant Sig Sauer, Inc.'s Motion to Transfer [DE 17] includes the statement that "Sig Sauer has no distributors or dealers located in Delaware." Brasseur Declaration, ¶ 26.
6. The Declaration of John Brasseur in Support of Defendant Sig Sauer, Inc.'s

Motion to Transfer [DE 17] includes the statement that “Sig Sauer does not ship any products to wholesale customers or distributors in Delaware.” Brasseur Declaration, ¶ 27.

7. A true and correct copy of the website for the sporting goods store Cabela’s is included as Exhibit 1 to this declaration. Exhibit 1 shows the availability to purchase the Sig Sauer, Inc. Rattler firearm, which includes one of the Accused Products in this litigation, from the Cabela’s store located in Christiana, Delaware.

8. Exhibit 2 shows a true and correct copy of the restrictions that are displayed when clicking on the link titled “View All Restrictions That May Apply”.

9. Delaware is not included as a state for which the sale of the Accused Product shown in Exhibit 1 is restricted.

10. On April 10, 2019, I conducted a telephone call with an employee of the Cabela’s Store located in Christiana, Delaware. The employee of that Cabela’s location confirmed that the Sig Sauer Rattler can be purchased and received at the Cabela’s store in Christiana, Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of April, 2019.



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William R. Brees  
Maxey-Fisher, PLLC  
Attorney for Plaintiff NST Global, LLC dba SB Tactical

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of April, 2019, a true and correct copy of the foregoing DECLARATION OF WILLIAM BREES IN SUPPORT OF PLAINTIFF NST GLOBAL, LLC'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR TRANSFER has been filed electronically with the Clerk of the Court using the CM/ECF filing system, which will send a notice of electronic filing to all counsel of record.

Dated: April 10, 2019

Respectfully submitted,

/s/  
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